

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

WARNER RECORDS INC., *et al.*
Plaintiffs,

v.

ALTICE USA, INC. and CSC HOLDINGS, LLC,
Defendants.

Case No. 2:23-cv-576-JRG-RSP

JOINT MOTION FOR ENTRY OF ADDENDUM TO PROTECTIVE ORDER

Pursuant to the Court's Order regarding Plaintiffs' agreements with Digital Service Providers (Dkt. 131), Plaintiffs Warner Records Inc., Atlantic Recording Corporation, Atlantic Records Group LLC, Bad Boy Records LLC, Big Beat Records Inc., Elektra Entertainment Group Inc., Fueled by Ramen LLC, Lava Records LLC, Maverick Recording Company, Nonesuch Records Inc., Rhino Entertainment Company, Rhino Entertainment LLC, Roadrunner Records, Inc., Rykodisc, Inc., Warner Music Inc., Warner Music International Services Limited, Warner Music Nashville LLC, Warner Records/QRI Venture, Inc., Sony Music Entertainment, Arista Music, Arista Records, LLC, LaFace Records, LLC, Sony Music Entertainment US Latin LLC, Ultra Records, LLC, Volcano Entertainment III, LLC, Zomba Recording LLC, Warner Chappell Music, Inc., Cotillion Music, Inc., Gene Autry's Western Music Publishing Co., Golden West Melodies, Inc., Intersong U.S.A., Inc., Unichappell Music Inc., W Chappell Music Corp., W.C.M. Music Corp., Warner- Tamerlane Publishing Corp., Sony Music Publishing (US) LLC, Colgems-EMI Music Inc., EMI April Music Inc., EMI Blackwood Music Inc., EMI Consortium Music

Publishing, Inc., EMI Consortium Songs, Inc., EMI Entertainment World Inc., EMI Gold Horizon Music Corp., EMI Miller Catalog Inc., EMI Mills Music Inc., EMI Robbins Catalog Inc., EMI U Catalog Inc., EMI UNART Catalog Inc., Famous Music LLC, Jobete Music Co., Inc., Screen Gems-EMI Music Inc., Stone Agate Music, and Stone Diamond Music Corp. (collectively, “Plaintiffs”) and Defendants Altice USA, Inc. and CSC Holdings, LLC (“Defendants” or “Altice”) (collectively “Parties”), jointly move for entry of the Parties’ proposed Addendum to the Stipulated Protective Order (Dkt. 51), which takes the form of the attached Proposed Order. The Parties jointly represent that they have met and conferred regarding the attached Addendum, that Plaintiffs have conferred with non-party Spotify USA, Inc., and that the Parties and Spotify are in agreement regarding the Addendum. Concerning production of the non-Spotify DSP Agreements, Plaintiffs represent that they will immediately begin producing the redacted agreements after entry of the Addendum.

Dated: March 5, 2025

Agreed to,

/s/ Jeffrey M. Gould w/permission
Rudolph Fink IV

/s/ Michael S. Elkin

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**Pro Hac Vice*

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document and all attachments thereto are being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served this March 5, 2025 on all counsel of record, each of whom is deemed to have consented to electronic service. L.R. CV-5(a)(3)(A).

/s/ Rudolph Fink IV
Rudolph Fink IV

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and (i) and that substantial discussion between Plaintiffs, Defendants, and non-party Spotify USA, Inc. have occurred and neither Spotify nor Defendants oppose the relief requested in this motion.

/s/ Rudolph Fink IV
Rudolph Fink IV